

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

EPAC TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	Civil Action No. 3:12-cv-00463
	)	
v.	)	Chief Judge Crenshaw
	)	Magistrate Judge Newbern
HARPERCOLLINS CHRISTIAN	)	
PUBLISHING, INC., f/k/a	)	JURY DEMAND
THOMAS NELSON, INC.,	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL**

EPAC Technologies, Inc. (“EPAC”), files this Motion for Leave to File Under Seal pursuant paragraph 7 of the Amended Protective Order (Docket No. 150) and Rule 5.07 of the Administrative Practices and Procedures for Electronic Case Filing adopted for use in this Court. In support of this Motion, EPAC states as follows:

1. The Amended Protective Order allows for the designation of certain documents as “Confidential” and/or “Attorneys’ Eyes Only” and the filing of such documents under seal.
2. EPAC’s Reply in Support of EPAC’s Motion in Limine Nos. 1 through 3 contains information that has been designated “Confidential” and/or “Attorneys’ Eyes Only” under the Agreed Protective Order. Namely, this Reply quotes from the Master Services Agreement (the “MSA”).
3. EPAC’s Reply in Support of EPAC’s Motion in Limine Nos. 4 through 5 contains information that has been designated “Confidential” and/or “Attorneys’ Eyes Only” under the Agreed Protective Order. Namely, this Reply quotes from the MSA.

4. EPAC's Reply in Support of EPAC's Motion in Limine No. 6 contains information that has been designated "Confidential" and/or "Attorneys' Eyes Only" under the Agreed Protective Order. Namely, this Reply refers to EPAC's calculation of its damages.

5. EPAC's Reply in Support of EPAC's Motion in Limine No. 7 contains information that has been designated as "Confidential" and/or "Attorneys' Eyes Only" under the Agreed Protective Order.

6. EPAC's Reply in Support of Motion to Exclude Conley contains information that has been designated as "Confidential" and/or "Attorneys' Eyes Only" under the Agreed Protective Order. Namely, this Reply paraphrases and quotes the MSA.

7. Accordingly, EPAC moves for leave to file these documents under seal pursuant to the Agreed Protective Order.

WHEREFORE, EPAC seeks leave to file the foregoing documents under seal.

Respectfully submitted,

/s/ William B. Hill, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing document is being made via ECF to the following on September 14, 2018:

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